

ORIGINAL

005777

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

RECEIVED

OCT 28 9 09 AM '96

SPECIAL SERVICES FEES AND CLASSIFICATION]

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
DOCKET NO. MC96-3

INTERROGATORIES OF DAVID B. POPKIN TO DOUGLAS F. CARLSON

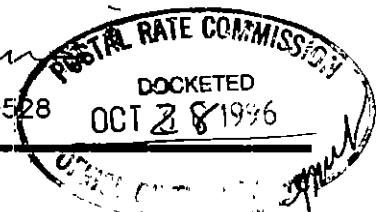
David B. Popkin hereby requests Douglas F. Carlson to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

October 21, 1996

Respectfully submitted,

David B. Popkin

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528



DBP/DFC-1 By renting a post-office box near your place of work (in Berkeley) instead of a box at the post office that serves the five-digit ZIP Code area in which you live (Emeryville), do you believe that you impose costs on the Postal Service higher than the costs that you would impose if you instead used a box in Emeryville?

DBP/DFC-2 Witness Needham has testified repeatedly that nonresident boxholders are apt to present costlier situations to the Postal Service than resident boxholders. See, e.g., Response to DFC/USPS-T7-6. Do you have any evidence indicating that the Postal Service encourages or discourages customers from obtaining box service at a post office other than the one that serves the five-digit ZIP Code area in which they live?

DBP/DFC-3 Suppose the lobby hours in Emeryville were increased to match the lobby hours of your post office in Berkeley. Suppose, further, that delivery service in Emeryville became just as reliable as delivery service in Berkeley. Assuming the fee for each box were identical, would you move your box to Emeryville?

DBP/DFC-4 Do you contend that the nonresident fee would interfere with customers' ability to avoid delivery problems at particular post offices by obtaining box service at another post office?

DBP/DFC-5 Can you cite an example other than Emeryville of a post office that experiences serious delivery problems?

DBP/DFC-6 Do you believe that customers can effectively obtain solutions to delivery problems by bringing the problems to the attention of postal authorities? Provide examples.

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

SPECIAL SERVICES FEES AND CLASSIFICATION]

DOCKET NO. MC96-3

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following follow-up interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. The conditions mentioned in my original interrogatories dated August 6, 1996 are incorporated herein by reference.

October 21, 1996 Respectfully submitted,



DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-T8-46 In your response to DBP/USPS-T8-40, you indicate that the customers can evaluate each of the six considerations that you made in your response to DBP/USPS-T8-25[i]. My interrogatory to you requested that you evaluate and compare each of these six considerations with respect to Standard Mail - Insured vs. Priority Mail - Registered. [a] With respect to mail preparation requirements, explain the differences, if any, between Standard Mail - Insured and Priority Mail - Registered. [b] Based on mail preparation requirements, how would a knowledgeable mailer compare the two services? Would they find them similar to each other? If not, explain what advantages and disadvantages they would find between them? Which service would be perceived as being better than the other and why? [c] Same as [a] except with respect to mail content restrictions. [d] Same as [b] except with respect to mail content restrictions. [e] Same as [a] except with respect to limitations on point of acceptance. [f] Same as [b] except with respect to limitations on point of acceptance. [g] Same as [a] except with respect to speed of delivery. [h] Same as [b] except with respect to speed of delivery. [i] Same as [a] except with respect to security. [j] Same as [b] except with respect to security. [k] Same as [a] except with respect to accountability. [l] Same as [b] except with respect to accountability.

DBP/USPS-T8-47 In your response to DBP/USPS-T8-41 you indicate four claims that exceeded \$500 for FY 96 from highest to lowest. The last two are not in that order. Please clarify.

DBP/USPS-T8-48 Regarding your response to DBP/USPS-T8-42, [a] confirm that the term "philatelic card product" does not appear as an official definition in any reference. [b] If not, explain. [c] Confirm that the term "philatelic card product" was made up by you to describe a particular product[s]. [d] If not, explain. [e] In your response to [g-h], you make reference to the sizes of certain cards. Confirm that all of the philatelic card products are of a size which meets the requirements for postal/stamped cards. [f] If not, explain. [g] Your response to [k] was not clear. Confirm that all uncanceled philatelic card products may also be utilized as postal/stamped cards if so desired by the holder of them. [h] If not, explain. [i] I request that an institutional response be made to part [n]. You were the one that referred to the Postal Reorganization Act.

DBP/USPS-T8-49 Your response to DBP/USPS-T8-43 is not clear nor does it respond to the specific interrogatory. I am not looking for your comparison of the two services. I am looking for responses to the specific questions asked for in DBP/USPS-T8-31 parts [b] through [g]. In other words, take the three very specific conditions that I have requested the comparison for and respond to the original interrogatory.

DBP/USPS-T8-50 Your response to DBP/USPS-T8-43 raises a number of questions. [a] Confirm that Express Mail may have delivery standards of 3 PM. [b] If not, explain. [c] Confirm that Express Mail does not have to be delivered the same date that it is mailed. [d] If not, explain. [e] Confirm that a Special Delivery article mailed early in the day can and will likely be delivered the same date of mailing if addressed to a local and perhaps nearby post office. [f] If not, explain. [g] Taking your example of an Express Mail and Special Delivery article arriving at a post office at 5 AM, why do you feel that it will be "highly unlikely" that the Special Delivery article will be delivered sooner? [h] What postal regulation covers the method of delivery referred to in your response to [g]? [i] Do the regulations allow, permit, and/or require that an Express Mail article be delivered by the regular carrier if delivery can be accomplished by the 12 noon or 3 PM delivery standard? [j] If so, provide copy of the specific regulation. If not, explain.

DBP/USPS-T8-51 [a] Based on your response to DBP/USPS-T8-33 and T8-44, confirm that your response to DBP/USPS-T8-33 is an unqualified "Yes"? [b] If not, explain.

DBP/USPS-T8-52 My original interrogatory DBP/USPS-T8-45 inadvertently referred to DBP/USPS-T8-35 which should have referred to DBP/USPS-T8-34. Please respond to the four parts of DBP/USPS-T8-34 if we restrict the USPS employees or consultants to those that are responsible for the setting of rates. ✓


BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

SPECIAL SERVICES FEES AND CLASSIFICATION]

DOCKET NO. MC96-3

MOTION TO ACCEPT LATE FILING OF FOLLOW-UP INTERROGATORY ✓

I request that my Follow-up Interrogatory DBP/USPS-T8-52 be accepted for late filing. This was as a result of an inadvertent reference in DBP/USPS-T8-45 to Interrogatory DBP/USPS-T8-35 rather than the correct reference of DBP/USPS-T8-34. This reference should have been obvious to the Postal Service since T8-44 referred to T8-33 and there was only one interrogatory following that one, namely T8-34. T8-35 was the first one of the new interrogatories. T8-34 had the four parts that were referred to. No party other than myself will be harmed by the grant of this request. In the event that any of the pleadings made today are received late, I move for acceptance.

October 21, 1996 Respectfully submitted, 
DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

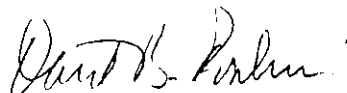
SPECIAL SERVICES FEES AND CLASSIFICATION]

DOCKET NO. MC96-3

REPLY TO ANSWER IN OPPOSITION TO MOTION OF DAVID B. POPKIN TO COMPEL
RESPONSE TO DBP/USPS-T8-16[D] AND TO MOTION OF DAVID B. POPKIN TO MODIFY THE
COMMISSION'S RULES OF PRACTICE. ✓

The Postal Service filed it's Reply on October 11, 1996 to my Motions. In as much as the Postal Service [Reply at 4] has agreed that those participants outside of the Washington metropolitan area will be provided an opportunity to inspect the library references, my primary concern has been satisfied so long as these library references will be provided at the same time as the response to which they are associated with. I am requesting that library references be provided to me at the time of the filing if they are referred to in any reply to me. I am requesting that the Commission consider my motion in future dockets.

October 21, 1996 Respectfully submitted,



DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

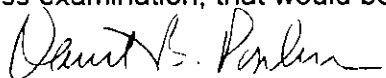
SPECIAL SERVICES FEES AND CLASSIFICATION]

DOCKET NO. MC96-3

REPLY TO RESPONSE OF UNITED STATES POSTAL SERVICE TO MOTION OF DAVID B.
POPKIN TO COMPEL RESPONSES TO INTERROGATORIES ✓

The Postal Service filed its response on October 11, 1996 to my Motion. The specific interrogatories that were asked of Witnesses Landwehr and Needham related to items that would require either written responses, including copies of directives, or evaluation of previous testimony. As such, a written response is requested. To the extent that the Postal Service makes reference to specific lines in the oral cross examination, that would be satisfactory.

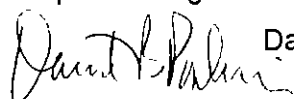
October 21, 1996 Respectfully submitted,



DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents upon all participants of record in this proceeding in accordance with Section 12 of the rules of practice.



David B. Popkin

October 21, 1996